



## VK Ecosystem Privacy Policy

### 1. Who we are

- 1.1. To ensure your use of the accesses, opportunities and benefits of the VK Ecosystem, your personal information is collected and used by us, V Kontakte Limited Liability Company, located at: prem. 1-N, bld. 12-14, lit. A, Khersonskaya str., St. Petersburg, 191024 Russia (hereinafter referred to as "we"), and entities providing the relevant Services or tools. You can find information about which entity provides this or that Service or tool in the User Documentation of the corresponding Service or tool.
- 1.2. This Privacy Policy sets out the principles of collection and use of your personal information as well as the procedure for processing and protecting this information, including from unauthorized access and disclosure, when you use the accesses, opportunities and benefits of the VK Ecosystem, including when you use VK Ecosystem Services and/or tools and the options available to you in connection with our use of your personal information.
- 1.3. This Privacy Policy should be read together and in addition to our VK Ecosystem User Agreement (available on the Internet at <https://id.vk.com/terms>), the terms of separate User Agreements for VK Ecosystem Services and/or tools and their Privacy Policies (User Documentation of the Service). In the event of any conflict between the terms of processing your personal information contained in this Privacy Policy and the VK Ecosystem User Agreement or User Documentation of a VK Ecosystem Service, this Privacy Policy will prevail.

### 2. This Privacy Policy

- 2.1. This Privacy Policy applies to registration, every access or actual use of any VK Ecosystem Service and/or tool, both currently existing and ones that will appear in the future, the Terms of Use of which refer to the VK Ecosystem User Agreement posted at <https://id.vk.com/terms>.
- 2.2. By providing access, opportunities and benefits of the VK Ecosystem, we, acting reasonably and in good faith, consider that you:
  - (a) have all the necessary rights to register in the VK Ecosystem and use the VK Ecosystem Services and/or tools;
  - (b) provide reliable information about yourself to the extent necessary to use the VK Ecosystem Services and/or tools;
  - (c) are aware of and accept this Privacy Policy.
- 2.3. We do not verify the user information we receive from you unless such verification is necessary in order for us to fulfill our obligations to you. Nevertheless, we assume that you provide reliable and sufficient information about yourself, as well as update it in a timely manner.
- 2.4. This Privacy Policy is available at <https://id.vk.com/privacy>.
- 2.5. This Privacy Policy is applied in the version in effect at the time of its actual use.

### 3. Information we collect about you

- 3.1. To implement the agreement between you and us and provide you with the access, opportunities and benefits of the VK Ecosystem, we improve the capacities of the VK Ecosystem, develop and implement new Services and tools, and also improve the availability of the VK Ecosystem. To achieve these goals, in accordance with current legislation, we collect, store, accumulate, organize, extract, compare, use and complete your data (hereinafter referred to as processing) when you sign up on the <https://id.vk.com> website, or for any VK Ecosystem Service, or to an external Service using the VK ID tool, as well as when you edit previously entered

information or enter additional information about yourself. We may also receive and transmit this data, as well as our automatic analysis of this data to our affiliates and partners, as indicated in the table below and in section 4 of this Privacy Policy.

- 3.2. Below we set out in more detail the reasons for data collection and processing, legal basis for collecting information when you use the VK Ecosystem.

|   | <b>Data we collect</b>  | <b>Purpose</b>   | <b>Legal basis</b>   |
|---|---|--|--|
| 1 | Data you provide when filling in the VK ID registration form<br><a href="https://id.vk.com">https://id.vk.com</a> : first name, last name, date of birth, gender, mobile phone number   | This is the minimum required information to sign you up for the VK Ecosystem. We use this information to manage and administer the VK Ecosystem, including providing you with access, opportunities and benefits of the VK Ecosystem. We use this data to fulfill our obligations to you as part of the functionality of the VK Ecosystem (for example, in cases where you request to restore access to your account in the VK Ecosystem). | Legal interests<br>Fulfilling the agreement between you and us |
| 2 | Data that you provide when signing up for any VK Ecosystem Service, or for an external Service using the VK ID tool, including your first name, last name, date of birth, gender, mobile phone number. Certain Services may ask you for less information; however, such incomplete accounts will be required to be filled in with the necessary data to complete its registration or filled in with additional information necessary for registration in such Services and the VK Ecosystem | We use this information to manage and administer the VK Ecosystem, including providing you with access, opportunities and benefits of the VK Ecosystem. We use this data to fulfill our obligations to you as part of the functionality of the VK Ecosystem (for example, in cases where you request to restore access to your VK Ecosystem account).  | Legal interests<br>Fulfilling the agreement between you and us |
| 3 | If necessary, a copy of your passport or another document of your choice containing your first name, last name,   | We use this data to verify you, verify your account in the VK Ecosystem and prevent abuse and violation of your rights or the rights of other persons. For example, we use this information to verify you if you have lost your  | Legal interests<br>Fulfilling the agreement                    |

|   |  |   |  |
|---|--|---|--|
|   | photograph, date of birth and the number of the main document proving your identity or the identity of your representative. We may take additional verification measures we deem reasonable to verify your VK Ecosystem account. | credentials and want to access your account with us.  | between you and us   |
| 4 | Additional data that you provide when editing your account in the VK Ecosystem.  | We use this information to manage and administer the VK Ecosystem, including providing you with access, opportunities and benefits of the VK Ecosystem. We also use this information to provide you with recommendations that we believe are of interest to you, updates and information about ours and selected third-party services, tools, products and services that we think you may be interested in. We use this information in order to adapt and improve the advertisements presented in the VK Ecosystem Services, evaluate the effectiveness of these advertisements, and also to improve the user experience. | Legal interests<br>Fulfilling the agreement between you and us |
| 5 | Additional data that you provide when using the VK Ecosystem Services and/or tools.  | We use this information to manage and administer the VK Ecosystem, including providing you with access, opportunities and benefits of the VK Ecosystem. We also use this information to provide you with recommendations that we believe are of interest to you, updates and information about ours and selected third-party services, tools, products and services that we think you may be interested in. We use this information in order to adapt and improve the advertisements presented in the VK Ecosystem Services, evaluate the effectiveness of these advertisements, and also to improve the user experience. | Legal interests<br>Fulfilling the agreement between you and us |
| 6 | Additional data obtained when accessing the VK Ecosystem Services and/or tools, including information about  | We use your data for internal control in order to constantly improve the access, opportunities and benefits of the VK Ecosystem, understand any errors that may arise when using the VK Ecosystem, notify you about changes in the VK   | Legal interests<br>Fulfilling the agreement                    |

|   |   |  |  |
|---|---|--|--|
|   | technical devices, technical interaction with the VK Ecosystem Service and/or tool (host IP address, operating system, browser information, geographic location, visit time, information about consent, Internet provider, as well as your navigating behavior and further actions in the VK Ecosystem.   | Ecosystem and personalize its use. Information containing the activity history in the VK Ecosystem is available in the "Security and Login" section of your account at <a href="https://id.vk.com/account/#/security">https://id.vk.com/account/#/security</a> . We also can use this information to provide you with recommendations that we believe are of interest to you, updates and information about ours and selected third-party services, tools, products and services that we think you may be interested in. | between you and us   |
| 7 | Location data   | We use your location data to generate recommendations, as well as to customize and improve advertisements that are presented in the VK Ecosystem Services and tools. We also use this information to provide you with location-relevant recommendations that we believe are of interest to you, updates and information about ours and selected third-party services, tools, products and services that we think you may be interested in. We also use this information to improve the user experience.                  | Legal interests<br>Fulfilling the agreement between you and us |
| 8 | Information generated by you when you submit requests to our Support Service.   | We use this information to fulfill your support request. We may also use this information to investigate any complaints on your behalf and provide you with a better service.  | Legal interests<br>Fulfilling the agreement between you and us |
| 9 | Information obtained as a result of your behavioral actions in the VK Ecosystem (in particular, the use of one or another Ecosystem Service or tool), for example, the date and time of access to the Services or tools; information about your activity while using the Services and/or tools (for example, search history, data on purchases in the | We use this information to manage and administer the VK Ecosystem, including providing you with access, opportunities and benefits of the VK Ecosystem. We may also use this data to tailor and improve the advertisements presented in the VK Ecosystem Services and tools, and evaluate the effectiveness of these advertisements. We may also use this information to investigate any complaints on your behalf and provide you with better service.  | Legal interests<br>Fulfilling the agreement between you and us |

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|----|---|---|--|
|    | Services, likes and preferences, contacts from your phone)  |   |  |
| 10 | Information obtained as a result of your use of payment functions in the VK Ecosystem (for example, the first and last four digits of your card number, which are necessary to be able to match this data with the user identification number). | We use this information to manage and administer the VK Ecosystem, including providing you with accesses, opportunities and benefits of the VK Ecosystem. We may also use this information to investigate any complaints on your behalf and provide you with better service.                  | Legal interests<br>Fulfilling the agreement between you and us |
| 11 | Data collected through third parties, such as OAuth providers including Sign in with Apple, Google, Mail.ru, OK.  | We will import this information into your profile.  | Legal interests<br>Fulfilling the agreement between you and us |
| 12 | Information received about you as a result of actions of other users in the VK Ecosystem.   | We use this information to manage and administer the VK Ecosystem, including providing you with accesses, opportunities and benefits of the VK Ecosystem. We may also use this data to tailor your use of the VK Ecosystem and your interactions with our access, opportunities and benefits. | Legal interests<br>Fulfilling the agreement between you and us |
| 13 | Information that is automatically received when accessing the Website using cookies.  | We use this information to tailor and improve the advertisements presented in the VK Ecosystem Services and tools, and evaluate the effectiveness of these advertisements.  | Fulfilling the agreement between you and us                    |

- 3.3. Our legitimate interests include the following:
  - a) maintaining and administrating the VK Ecosystem;
  - b) providing you with the access, opportunities and benefits of the VK Ecosystem, including the Services and tools;
  - c) improving and personalizing the access, opportunities and benefits of the VK Ecosystem for the benefit of all users of the VK Ecosystem;
  - d) understanding how you interact with VK Ecosystem Services and tools;
  - e) ensuring proper protection of your account in the VK Ecosystem;

- f) offering you other services, tools, products that, in our opinion, may be of interest to you (i.e. showing you advertising that takes into account your interests);
  - g) collection, processing and presentation of statistical data, big data and other research;
  - h) complying with any contractual, legal or regulatory obligation under applicable law.
- 3.4. Personal data collected about you by us during your use of the Services and/or tools of the VK Ecosystem may be correlated and linked to other information about you collected by us as part of your use of your account in the VK Ecosystem (for example, contact information, age and gender).
  - 3.5. In some cases, we collect technical data about you, starting from the time you gain access to the VK Ecosystem Service (for example, when loading a web page or launching an application), until the time you register with the relevant Service.
  - 3.6. In all cases, the processing of your personal data will be carried out exclusively for the purposes set out in clause 3.2. of this Privacy Policy, unless otherwise provided by the User Documentation of the corresponding Service/tool.
  - 3.7. By means of functionality and User Documentation of individual Services, you may be given the opportunity to post in the Services any other information about yourself in addition to that which was specified in accordance with clause 3.2. of this Privacy Policy. We do not aim to process such information and do not include it in the information that we collect about you.
  - 3.8. Some Services and tools of the VK Ecosystem allow you to show information about yourself in your profile, which is available to be viewed by other users of the same Service or the Internet. Such information, including your personal data, may be available to an indefinite number of Internet users, with the consideration of the architecture and functionality of the corresponding Service or the VK Ecosystem tool (which may change from time to time) and settings of the desired privacy level. We, acting reasonably and in good faith, believe that you understand that by posting your personal information, you have clearly made this information publicly available, and this information may become available to other users of the Service and to other Internet users, as well as may be copied and distributed by them. We recommend you take a responsible approach toward resolving the issue concerning the amount of your personal information posted on the Services.
  - 3.9. Your personal information may also be processed if it is legally required by law enforcement or regulatory authorities or agencies to defend or enforce legal requirements. We will not delete personal information if it is relevant to an investigation or dispute. Information will continue to be stored until these issues are fully resolved and/or for a period that is required and/or permissible in accordance with applicable laws.
  - 3.10. Please note: if you do not want us to process sensitive and special categories of data about you (including data concerning your health, racial or ethnic background, political views, religious or philosophical beliefs, sex life and sexual orientation), you must refrain from publishing this information or posting this data on the VK Ecosystem Services and/or using its tools. At the same time, you should take into account that we cannot ask for your consent to process such data, since we have not been informed in advance of the potentially sensitive nature of the personal data that you may have published.
  - 3.11. Please note that if you withdraw your consent to the processing of your data or do not provide the data that we need to maintain and administer the VK Ecosystem, you will not be able to access VK Ecosystem Services and tools or sign up for the VK Ecosystem and its Services.
  - 3.12. If we need to continue processing your data for any other purpose in accordance with the provisions set out in this Privacy Policy, we will provide you with details on this additional purpose before processing.
  - 3.13. In order to fulfill the agreement between us and provide you with access, opportunities and benefits of the VK Ecosystem, we improve the VK Ecosystem, the provided services, tools and

products, develop and implement new services, tools and products, improve them and optimize their quality. To ensure implementation of these goals, we may send you service mailings (for example, emails, SMS) to receive feedback (for example, surveys) using our services, tools and/or via third parties. We may collect, store, accumulate such data.

#### 4. Data exchange

- 4.1. We do not transfer your personal data to any third parties, except as expressly provided for by this Privacy Policy or the policies of individual VK Ecosystem Services.
- 4.2. We may share your data with VK Ecosystem Services, as well as external Services that use VK Ecosystem tools, to provide you with accesses, opportunities and benefits of the VK Ecosystem, for example, if you decide to log in to the Service using the VK ID tool. By starting to use such a Service/tool/its individual functions, you agree to such transfer of your data to the extent necessary for the operation of the Service/tool. Thereby, you also agree and accept the User Documentation of that VK Ecosystem Service and/or tool in full without any reservations and exclusions. If you disagree with any of the provisions of the User documentation of the Service/tool, you are not entitled to use such Service/tool. A list of VK Ecosystem Services is available at [https://vk.com/vk\\_ecosystem\\_services](https://vk.com/vk_ecosystem_services). A list of VK Ecosystem tools is available at [https://vk.com/vk\\_ecosystem\\_tools](https://vk.com/vk_ecosystem_tools).
- 4.3. We may also share your data with our third-party contractors and developers of the VK Ecosystem Services and tools, provided that these third parties comply with the obligations regarding the confidentiality of your personal data collected by the VK Ecosystem and the Services you use and the tools they offer.
- 4.4. Sometimes, we provide you with the opportunity to transfer your VK Ecosystem account data to third parties through special technologies (OAuth and others), subject to your consent to such transfer. At the same time, we do not guarantee the completeness and correctness of the transfer of account data and are not responsible for the safety of data during the transfer.
- 4.5. V Kontakte LLC and other Services, using their own advertising services, may show you advertisements.

#### 5. International transfers

- 5.1. We may transfer and maintain your personal information on our servers or databases outside of Russia and the European Economic Area (EEA).
- 5.2. The countries to which we transfer your data may not have the same data protection laws as your jurisdiction has. We use reasonable cybersecurity measures and/or apply Standard Contractual Clauses (e.g. model clauses, data processing agreement/addendum) to ensure that your data is adequately protected.

#### 6. Storage periods

- 6.1. We will retain your personal information for as long as is necessary to fulfill the purposes for which the data was collected, depending on the legal basis upon which the data was obtained, and/or to meet additional legal/regulatory obligations that stipulate that we must keep your personal information for a specified period of time and/or as is permissible by applicable law.
- 6.2. You can delete your personal data using the "delete account" function available on the website at <https://id.vk.com>. Deleting an account in the VK Ecosystem means that you will not be able to use all VK Ecosystem Services and tools. You have the right to restore your account within 210 days from the date of self-deletion of the account

- 6.3. We can delete your account in the VK Ecosystem if there are grounds provided for by applicable law or the VK Ecosystem User Agreement <http://id.vk.com/terms>.
- 6.4. If your account is deleted, we will store your data on our electronic media for the period required and established by applicable law.

## 7. Your rights

- 7.1. In certain circumstances, you have the following rights in relation to your personal information:
  - a) the right to free access to your personal information by viewing your account data in the VK Ecosystem;
  - b) the right to request that we update, block or delete your personal data if the data is incomplete, outdated, incorrect, illegally obtained or no longer related to the purpose of the processing;
  - c) the right to restrict the use of your personal information;
  - d) the right to request to delete your personal information. Deleting certain information about yourself from your account in the VK Ecosystem may lead to the inability to provide you with access to some VK Ecosystem Services and tools;
  - e) the right to object to the processing of your personal information;
  - f) the right to data portability (under certain circumstances and depending on the jurisdiction);
  - g) the right not to accept an automated decision;
  - h) the right to file a complaint with a supervisory authority.
- 7.2. If you would like to exercise these rights, please send your written request to prem. 1-N, bld. 12-14, lit. A, Khersonskaya str., St. Petersburg, Russia, 191024. We will endeavor to respond to you within 30 days of receiving your request. We will need to verify your identity before we can disclose any personal information to you.
- 7.3. You can view a summary of information about yourself via your personal account on the website at <https://id.vk.com/>.
- 7.4. You also have the right to independently delete your account in the VK Ecosystem and make changes and corrections to your personal data in the account section at <https://id.vk.com/account/#/personal>, provided that such changes and corrections contain updated and reliable information.
- 7.5. You can independently disable individual Services through your account in the VK Ecosystem. By doing so, you refuse to use such Services and all rights previously granted to you in connection with the use of such Services.

## 8. Security measures

- 8.1. We take technical, organizational and legal measures, including encryption, when necessary, in order to protect your personal data from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other illegal actions.
- 8.2. Access to the VK Ecosystem is allowed using your login (email address, or mobile phone number, or alphanumeric value) and password. You are responsible for maintaining the privacy of this information. You should not share your personal information with third parties, and we recommend that you take steps to ensure the privacy of this information.
- 8.3. Your data is stored only on electronic media and processed using automated systems, with the exception of events when non-automated data processing is required in connection with the implementation of legal requirements. Information is processed primarily automatically without access by our employees and contractors. If such access is granted by us, it is only to the extent necessary for such persons to perform their official duties or obligations under an agreement

with us, while such persons are obligated to comply with security requirements when accessing the information. To protect and maintain data confidentiality, all employees/contractors comply with internal rules and procedures regarding the processing of information. These persons also comply with all technical and organizational security measures provided for by applicable laws and necessary to protect information.

- 8.4. In order to ensure more reliable protection of information about you, we use a system of linking an account in the VK Ecosystem to a mobile phone number. To create this link, you must provide us with your mobile phone number. If you lose your login or password, you can restore access to your account, for example, using the recovery code contained in the SMS message that you receive on your mobile phone, the old password, or push notifications with login confirmation.
- 8.5. In order to reduce the likelihood of unauthorized access to an account in the VK Ecosystem, if the login and password are entered using a server that is unusual for you (in particular, a server of a foreign state), we request additional confirmation of the account access in the VK Ecosystem using a message requesting a confirmation code sent to you via SMS or another personal message. After three unsuccessful attempts to enter digits, the possibility to access the account and/or the VK Ecosystem Services using this server is blocked for 4 hours.
- 8.6. For the purposes of your registration, authorization, confirmation of the relevance of the phone number linked to the VK Ecosystem account (verification), or restoration of access to your account, we can also use missed call verification via your phone number. After receiving this verification call, you need to enter, in the corresponding window, the code, which is the last few digits of the incoming number. Depending on the operating system of the mobile device, entering the code in the corresponding window can be performed automatically, but only after obtaining permission from you to access the call history on the mobile device. You can grant this permission by pressing "Allow" or a similar button. Access to the call history on your mobile device is used solely for the purpose of automating code entry when using the missed call verification function, as well as protection against spam and mass registrations.
- 8.7. You have the right to receive information about authentication times and the devices used for authentication on your VK ID personal account through your account in the VK Ecosystem.

## 9. Amendments to this Policy

- 9.1. We may change and/or update this Privacy Policy from time to time. If this Privacy Policy changes, we will post an updated version on this page. We recommend you regularly revisit this page so that you are always aware of our information practices and any changes in this practice.
- 9.2. You have the right to refuse to accept amendments and additions to this Privacy Policy. Such a refusal will mean your refusal to use all of the VK Ecosystem Services and tools, as well as the termination of all rights previously granted to you. In event of your disagreement with the terms of this Privacy Policy, the use of the VK Ecosystem Services and tools should be immediately terminated.
- 9.3. You also have the right to refuse to accept amendments and additions to the Policies of individual Services. In event of such disagreement, the use of the Service must be terminated immediately.

## 10. Contact us

- 10.1. If you have any questions, please send your requests to us by mail to prem. 1-N, bld. 12-14, lit. A, Khersonskaya str., St. Petersburg, Russia, 191024. In order for us to efficiently process your

request, please refer to this Privacy Policy. We will endeavor to respond to you within 30 days of receiving your request.

- 10.2. All correspondence we receive (written or electronic requests) is classified as restricted information and cannot be disclosed without your written consent. Personal data and other information about you cannot be used without your consent for any purpose other than to respond to a request, unless it is clearly stated by law.